

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Case No. 20-12345 (SCC)
	)	
THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
	)	
Debtor. <sup>1</sup>	)	
	)	

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**FOURTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BOWEN BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM OCTOBER 1, 2021 THROUGH JANUARY 31, 2022**

Burns Bowen Bair LLP (“BBB” or the “Firm”), special insurance counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the Debtor in the above-captioned case (the “Debtor”), hereby submits this third interim fee application (the “Fee Application”) for the period from October 1, 2021 through January 31, 2022 (the “Interim Compensation Period”) in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases, effective December 4, 2009 (together with the “Local Rules”, the “Local Guidelines”), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. §330, effective January 31, 1996 (the “U.S. Trustee Guidelines”), and this Court’s Order Authorizing and Approving The Official Committee of Unsecured Creditors’ Application to Retain and

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<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

Employ Burns Bowen Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 [Docket No. 246]. BBB requests compensation in the amount of \$75,804.00 for fees on account of reasonable and necessary professional services rendered to the Committee by BBB during the Interim Compensation Period and reimbursement of actual and necessary costs and expenses in the amount of \$1,078.25 incurred by BBB during the Interim Compensation Period. In support of this Fee Application, BBB submits the declaration of Timothy W. Burns (the “Burns Declaration”) attached hereto as **Exhibit A** and incorporated herein by reference. In further support of the Application, BBB respectfully represents as follows:

**Preliminary Statement**

1. During the Interim Compensation Period, BBB represented, advised and assisted the Committee in fulfilling its statutory obligations and duties to unsecured creditors and rendered services to the Committee in accordance with its instructions and directions. By this Fee Application, BBB requests that the Court authorize the interim allowance and payment of fees incurred by BBB during the Interim Compensation Period in the total amount of \$75,804.00 as compensation for services rendered to the Committee.

2. To date, BBB has been paid a total of \$61,721.45, comprising (a) compensation of \$60,643.20, representing 80% of its fees incurred during the Interim Compensation Period; and (b) reimbursement of \$1,078.25, representing 100% of its actual and necessary expenses incurred during the Interim Compensation Period. By this Fee Application, BBB seeks interim allowance and payment of all compensation for services rendered during the Interim Compensation Period.

### **Jurisdiction and Basis for Relief**

3. This Court has jurisdiction to hear and determine this Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. Sections 328(a), 330, and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014 are the statutory predicates for the relief sought by this Fee Application.

### **Background**

4. On October 1, 2020 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the Bankruptcy Court for the Southern District of New York. The Debtor is operating its business and managing its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this case.

5. On October 16, 2020, the Office of the United States Trustee (the “UST”) appointed the Committee pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of nine individuals who hold claims against the Debtor, including eight individuals who were sexually abused as minors by perpetrators for whom the Debtor was responsible and one representative of a minor with a civil rights claim against the Debtor.

#### **A. BBB Retention**

6. Following the Committee’s appointment, the Committee determined it needed special insurance counsel and, subject to Court approval, hired BBB on October 29, 2020.

7. On November 20, 2020, the Committee filed The Official Committee of Unsecured Creditors’ Application to Retain and Employ Burns Bowen Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 (the “Retention Application”). As set forth in

the Retention Application, the Committee selected BBB to provide the following services to the Committee:

- i. Analyzing, investigating, and assessing the availability of coverage under the Diocese's insurance policies;
- ii. Representing the Committee in the adversary proceeding the Diocese filed against its insurers, Adv. Pro. No. 20-01227, *The Roman Catholic Diocese of Rockville Centre, New York v. Arrowood Indemnity Co. fka Royal Insurance Co., et al.*;
- iii. Engaging in potential mediation and/or other resolution of the claims, demands, and/or lawsuits related to the Diocese's insurance policies;
- iv. Advising, negotiating, and advocating on behalf of the Committee with respect to the Diocese's insurance policies; and;
- v. Providing related advice and assistance to the Committee as necessary.

8. On December 9, 2020, the Court entered the Order Authorizing and Approving The Official Committee of Unsecured Creditors' Application to Retain and Employ Burns Bowen Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 [Docket 246] (the "Retention Order"). The Retention Order provides that all compensation and reimbursement of costs and expenses incurred during BBB's employment be paid only after appropriate application and approval of this Court.

**B. Compensation Paid and Its Source**

9. All services for which BBB requests compensation were performed for or on behalf of the Committee. BBB has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between BBB and any other person other than the partners of BBB for the sharing

of compensation to be received for services rendered in these cases. BBB has not received a retainer in these cases.

**C. Monthly Fee Statements for the Interim Compensation Period**

10. BBB has filed and served the following monthly fee statements for the period October 1, 2021 through January 31, 2022, pursuant to the Interim Compensation Order. To date, no objections to the Prior Monthly Statements have been filed.

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Approved Fees</b>	<b>Approved Expenses</b>
November 30, 2021 [Dkt. 892]	October 1, 2021 – October 31, 2021	\$34,964.00	\$833.15	\$27,971.20	\$833.15
December 30, 2021 [Dkt. 937]	November 1, 2021 – November 30, 2021	\$5,678.50	\$0.00	\$4,542.80	\$0.00
January 28, 2022 [Dkt. 967]	December 1, 2021 – December 31, 2021	\$16,037.50	\$0.00	\$12,830.00	\$0.00
February 25, 2022 [Dkt. 990]	January 1, 2022 – January 31, 2022	\$19,124.00	\$245.10	\$15,299.20	\$245.10

11. The fees requested are reasonable, and all amounts requested were for actual and necessary services rendered on behalf of the Committee.

**Statement of Services Rendered and Time Expended**

12. **Exhibit B** sets forth a timekeeper summary that includes the respective names, positions, bar admissions, hourly billing rates and aggregate hours spent by each BBB professional and paraprofessional that provided services to the Committee during the Interim Compensation Period. The rates charged by BBB for services rendered to the Committee are the same rates that BBB charges generally for professional services rendered to its non-bankruptcy clients.

13. **Exhibit C** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by BBB in connection with services rendered to the Committee during the Interim Compensation Period.

14. **Exhibit D** is a chart setting forth the Customary and Comparable Compensation Disclosures.

15. BBB's invoices for the Interim Compensation Period were attached as exhibits to the Prior Monthly Statements [Docket Nos. 892, 937, 967, and 990] and are re-attached here as **Exhibit E**.

**Services Rendered and Disbursements Incurred During the Interim Compensation Period**

16. During the Interim Compensation Period, BBB expended a considerable number of hours on behalf of the Committee including, but not limited to, preparing for and participating in conferences with the mediator regarding insurance issues; researching and analyzing New York insurance law with respect to various issues impacting the insurance claims and related strategy, including potential settlement issues; extensive analysis of the Diocese's historical insurance program, including thorough review of additional insured issues, self-insured retention (SIR) issues, and applicable limits issues; presenting to the Committee on insurance strategy; assessing claims-slotting issues in connection with upcoming mediation; analysis regarding additional insurance materials needed for production by the Diocese; communications with the Debtor's counsel and the insurers' counsel; and formulating overall insurance strategy on behalf of the Committee, including strategy for the upcoming mediation. These tasks are not meant to be a detailed description of all work performed.

17. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by BBB is fair and reasonable given (a) the complexity of the cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, BBB has reviewed the requirements of the Local

Rules, the Local Guidelines, and the Interim Compensation Order, and believes that this Application complies with such rule and order.

**Actual and Necessary Expenses Incurred by BBB**

18. As summarized in **Exhibit C** attached hereto, BBB has incurred a total of \$1,078.25 in expenses on behalf of the Committee during the Interim Compensation Period for which it seeks reimbursement.

**Allowance of Compensation**

19. Section 330(a)(1)(A) of the Bankruptcy Code provides that the Court may award to a professional person, “reasonable compensation for actual, necessary services rendered.” 11 U.S.C. § 330(a)(1)(A). Section 330(a)(3)(A), in turn, provides that in determining the amount of reasonable compensation to be awarded, the Court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:

- i. The time spent on such services;
- ii. The rates charges for such services;
- iii. Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered toward the completion of, a case under this title;
- iv. Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- v. Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A).

20. The congressional policy expressed above provides for adequate compensation in order to continue to attract qualified and competent professionals to bankruptcy

cases. BBB respectfully submits that the consideration of these factors should result in this Court's allowance of the full compensation sought.

#### **Time and Labor Required**

21. During the Interim Compensation Period, the Committee relied heavily on the experience and expertise of BBB when dealing with the matters described herein. As a result, BBB devoted significant time and effort to perform properly and expeditiously the required professional services. During the Interim Compensation Period, BBB expended 121.70 hours in providing the requested professional services. BBB's hourly billing rate is based on BBB's normal billing rates for services of this kind and is competitive with other advisory firms.

#### **Necessity of BBB's Services**

22. This bankruptcy case addresses issues that raise complex questions and require a high level of skill and expertise to efficiently and accurately address. The professional services described herein were performed by BBB to, among other things, ensure that the Roman Catholic Diocese of Rockville Centre, New York's over 60 years of insurance policies, including both primary and excess coverage, are fully available to compensate the sexual abuse survivors.

#### **Experience and Ability of the Professionals**

23. BBB has extensive experience in complex insurance disputes and contested issues, including coverage litigation, insurance class actions, counterparty disputes with insurers, and domestic and international insurance arbitration. Additionally, BBB has extensive experience advising and working in concert with other attorneys to navigate discrete insurance issues in the context of complex litigation proceedings. BBB has successfully recovered substantial insurance proceeds in other actions involving insurance disputes arising from sexual abuse allegations involving Catholic dioceses.



**Reservation of Rights**

24. It is possible that some professional time expended or expenses incurred by BBB during the Application Period are not reflected in this Application. BBB reserves the right to include such amounts in future fee applications.

**Notice**

25. Pursuant to the Interim Compensation Order, BBB has provided notice of this Fee Application upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). No other or further notice need be provided.

**Conclusion**

26. BBB respectfully requests that the Court enter an order, in the form attached hereto, (a) granting the relief requested in this Fee Application; (b) allowing (i) BBB interim fees in the total amount of \$75,804.00 for services rendered in the Chapter 11 cases, and (ii) reimbursement of actual and necessary costs and expenses in the amount of \$1,078.25 during the Interim Compensation Period; (c) award and order to be paid to BBB the balance of any such fees

that remain unpaid, after deducting interim payments already received by BBB pursuant to the Interim Compensation Order; and (d) granting such further relief as is just and proper.

Dated: March 15, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ James I. Stang

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James I. Stang (admitted *pro hac vice*)  
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-and-

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*Counsel for the Official Committee of Unsecured Creditors  
of The Roman Catholic Diocese  
of Rockville Centre, New York*

**BURNS BOWEN BAIR LLP**

/s/ Timothy W. Burns

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Timothy W. Burns (admitted *pro hac vice*)  
Jesse J. Bair (admitted *pro hac vice*)  
10 E. Doty Street, Suite 600  
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jbair@bbblawllp.com

*Special Insurance Counsel for the Official Committee of  
Unsecured Creditors of The Roman Catholic Diocese of  
Rockville Centre, New York*

**EXHIBIT A**

**Declaration of Timothy W. Burns**

PACHULSKI STANG ZIEHL & JONES LLP

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-and-

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Counsel for the Official Committee  
of Unsecured Creditors of The Roman  
Catholic Diocese  
of Rockville Centre, New York

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 20-12345 (SCC)
	)	
THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
	)	
Debtor. <sup>1</sup>	)	
	)	

**DECLARATION OF TIMOTHY W. BURNS IN SUPPORT OF  
FOURTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BOWEN BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM OCTOBER 1, 2021 THROUGH JANUARY 31, 2022**

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<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

I, Timothy W. Burns, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016- of the Local Rules for the Bankruptcy Court for the Southern District of New York that the following is true and correct:

i. I am a partner with the law firm of Burns Bowen Bair LLP (“BBB” or the “Firm”), with offices located at 10 E. Doty Street, Suite 600, Madison, WI 53703. I am duly admitted to practice law in, among other places, the States of Wisconsin, Illinois, and Missouri.

ii. I have personally reviewed the information contained in the Application and believe its contents to be true and correct to the best of my knowledge, information, and belief. In addition, I believe that the Application complies with the Local Rules for the Southern District of New York and the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases*.

iii. All services for which BBB requests compensation were performed for or on behalf of the Committee. BBB has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between BBB and any other person other than the partners of BBB for the sharing of compensation to be received for services rendered in these cases. BBB has not received a retainer in these cases.

iv. BBB makes the following disclosures pursuant to the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013*.

v. The Court authorized the Committee to retain BBB as their special insurance counsel in this chapter 11 case pursuant to the *Order Authorizing and Approving The Official Committee of Unsecured Creditors' Application to Retain and Employ Burns Bowen Bair LLP as Special Insurance Counsel Effective as of October 29, 2020* (the "Retention Order") [Docket 246]. The billing rates in this Application are those disclosed and approved at retention.

vi. Seven professionals and two paraprofessionals are included in this Application. Of those professionals, five billed fewer than 15 hours during the Interim Compensation Period.

vii. In accordance with the U.S. Trustee Guidelines, BBB responds to the questions identified therein as follows:

Question 1: Did BBB agree to any variations from, or alternatives to, BBB's standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Answer: Yes. I, Timothy W. Burns, agreed to reduce my hourly rate in this matter from my standard hourly rate of \$1090 per hour to \$975 per hour.

Question 2: If the fees sought in the Application as compared to the fees budgeted for the time period covered by the Application are higher by 10% or more, did BBB discuss the reasons for the variation with the client?

Answer: N/A.

Question 3: Have any of the professionals included in the Application varied their hourly rate based on geographic location of the bankruptcy case?

Answer: No.

Question 4: Does the Application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices?

Answer: Yes, a relatively small amount of time was incurred preparing and reviewing BBB's fee applications and associated exhibits, which included BBB's invoices. No amount of time was incurred preparing or revising invoices other than in connection with BBB's fee applications.

Question 5: Does the Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.

Answer: No.

Question 6: Does the Application include any rate increases since BBB's retention in these cases?

Answer: No.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 15, 2022

/s/ Timothy W. Burns  
Timothy W. Burns

## **EXHIBIT B**

### **Timekeeper Summary**



**EXHIBIT B**

**Timekeeper Summary**

<b>Professional</b>	<b>Title</b>	<b>Year of Bar Admission</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Timothy W. Burns	Partner	1991	\$975.00	27.90	\$27,202.50
Jesse J. Bair	Partner	2013	\$625.00	45.10	\$28,187.50
Jeff J. Bowen	Partner	2005	\$770.00	1.0	\$770.00
Brian P. Cawley	Associate	2020	\$420.00	16.40	\$6,888.00
Kacy C. Gurewitz	Associate	2021	\$420.00	7.50	\$3,150.00
Leakhena Au	Associate	2020	\$420.00	.20	\$84.00
Chalisa Sims	Associate	2021	\$420.00	17.10	\$7,182.00
Brenda Horn	Paralegal	N/A	\$360.00	5.70	\$2,052.00
Karen Dempski	Paralegal	N/A	\$360.00	.80	\$288.00
<b>Total</b>				<b>121.70</b>	<b>\$75,804.00</b>
<b>Average Billing Rate (Attorneys Only)</b>			<b>\$578.57</b>		

## **EXHIBIT C**

### **Expense Summary**

**EXHIBIT C**

**Expense Summary**

<b>Expense</b>	<b>Total Expenses</b>
Wisconsin Certificates of Good Standing for T. Burns and J. Bair	\$6.10
Third Quarter 2021 PACER	\$324.80
Illinois Certificate of Good Standing for T. Burns	\$16.00
Missouri Certificate of Good Standing for T. Burns	\$16.25
Hearing attendance fee for T. Burns and J. Bair	\$70.00
Court fee, <i>Pro Hac Vice</i> motions for T. Burns and J. Bair in the Interstate district court action	\$400.00
Fourth Quarter 2021 PACER	\$245.10
<b>TOTAL:</b>	<b>\$1078.25</b>

## **EXHIBIT D**

### **Compensation Disclosures**

**EXHIBIT D**

**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES WITH FEE APPLICATIONS**

(See Guidelines C.3. for definitions of terms used in this Exhibit.)

<b>CATEGORY OF TIMEKEEPER</b> (Using categories already maintained by the firm)		<b>BLENDED HOURLY RATE</b>	
		<b>BILLED</b> Firm timekeepers for preceding year, excluding bankruptcy*	<b>BILLED</b> In this fee application
	Sr./Equity Partner/Shareholder	\$790.69	\$758.92
	Of Counsel	N/A	N/A
	Associate	\$420.00	\$420.00
	Paralegal	\$360.00	\$360.00
	Case Management Assistants	N/A	N/A
	All Timekeepers Aggregated	\$665.25	\$603.65

\* Represents approximate blended hourly rate for all firm timekeepers in non-bankruptcy cases for calendar year 2021. Please also note that approximately 50% of BBB's hours for calendar year 2021 consisted of hours worked in contingent matters, meaning that BBB tracked the hours worked (and the corresponding hourly rate) but did not bill those hours to the client.

Case Name: The Roman Catholic Diocese of Rockville Centre, New York

Case Number: 20-12345 (SCC)

Applicant's Name: Burns Bowen Bair LLP

Date of Application: March 15, 2022

Interim or Final: Interim

## **EXHIBIT E**

### **Invoices**

Objection Deadline: December 15, 2021

BURNS BOWEN BAIR LLP

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

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*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11

Case No. 20-12345 (SCC)

**TWELFTH MONTHLY FEE STATEMENT OF BURNS BOWEN BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
OCTOBER 1, 2021 THROUGH OCTOBER 31, 2021**

Name of Applicant:	Burns Bowen Bair LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	October 1, 2021 – October 31, 2021
Amount of Compensation sought as actual, reasonable, and necessary:	\$34,964.00 80% of which is \$27,971.20
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$833.15
TOTAL (80% of fees and 100% of costs)	\$28,804.35

**This is the Twelfth Monthly Fee Statement.**

### **PRELIMINARY STATEMENT**

Burns Bowen Bair LLP (“Burns Bowen Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this twelfth monthly statement (the “Monthly Statement”) for the period from October 1, 2021 through October 31, 2021 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bowen Bair requests: (a) interim allowance and payment of compensation in the amount of \$27,971.20 (80% of \$34,964.00) of fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bowen Bair and (b) reimbursement of actual and necessary costs and expenses in the amount of \$833.15 during the Statement Period.

### **FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bowen Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	9.40	\$9,165.00
Jesse Bair	Partner	2020	2013	\$625	14.60	\$9,125.00
Brian Cawley	Associate	N/A	2020	\$420	11.60	\$4,872.00
Kacy Gurewitz	Associate	N/A	2021	\$420	7.20	\$3,024.00
Leakhena Au	Associate	N/A	2020	\$420	.20	\$84.00
Chalisa Sims	Associate	N/A	2021	\$420	17.10	\$7,182.00
Karen Dempski	Paralegal	N/A	N/A	\$360	.80	\$288.00
Horn, Brenda	Paralegal	N/A	N/A	\$360	3.4	\$1,224.00
<b>TOTAL:</b>					<b>64.3</b>	<b>\$34,964.00</b>



2. The rates charged by Burns Bowen Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

**EXPENSES INCURRED DURING THE STATEMENT PERIOD**

3. Set forth below is a categorical list of expenses incurred by Burns Bowen Bair during the Statement Period in the course of representing the Committee.

	<b>Description</b>	<b>Amount</b>
10/1/2021	Certificates of Good Standing for T. Burns and J. Bair (Wisconsin)	\$6.10
10/1/2021	Certificate of Good Standing for T. Burns (Illinois)	\$16.00
10/1/2021	Certificate of Good Standing for T. Burns (Missouri)	\$16.25
10/1/2021	Third Quarter 2021 PACER fees	\$324.80
10/4/2021	Court hearing attendance fee for J. Bair and T. Burns	\$70.00
10/18/2021	Court fee for <i>Pro Hac Vice</i> motions for T. Burns and J. Bair in the Interstate District Court action	\$400.00
	<b>TOTAL:</b>	<b>\$833.15</b>

**NOTICE AND OBJECTION PROCEDURES**

4. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bowen Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bowen Bair submits that no other or further notice need be provided.

5. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **December 15, 2021** (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

6. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bowen Bair 80% of the fees set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: November 30, 2021

BURNS BOWEN BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: tburns@bbblawllp.com

Email: jbair@bbblawllp.com

*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

## Exhibit A

## Burns Bowen Bair LLP

10 E. Doty St., Suite 600  
 Madison, Wisconsin 53703-3392  
 608-286-2302  
 www.bbblawllp.com

**The Official Committee of Unsecured Creditors  
 of The Roman Catholic Diocese of Rockville  
 Centre**

**Issue Date :** 11/5/2021

**Bill # :** 00621

**Due Date :** Upon Receipt

**Matter:** Insurance

**Fees**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Billable Hours</u>	<u>Rate</u>	<u>Amount</u>
10/1/2021	Jesse Bair	Review correspondence from B. Michael re upcoming mediation status conference (.1);	0.10	\$625.00	\$62.50
10/1/2021	Timothy Burns	Review the Debtor's motion to retain experts (.2);	0.20	\$975.00	\$195.00
10/1/2021	Timothy Burns	Review Judge Cronan's order withdrawing the reference as to LMI (.4);	0.40	\$975.00	\$390.00
10/1/2021	Timothy Burns	Reviewed the Diocese of Brooklyn's North Carolina complaint against Arrowood (.4);	0.40	\$975.00	\$390.00
10/1/2021	Jesse Bair	Review notice of status conference concerning case mediation (.1);	0.10	\$625.00	\$62.50
10/4/2021	Jesse Bair	Review correspondence from K. Dine re mediator selection (.1);	0.10	\$625.00	\$62.50
10/4/2021	Timothy Burns	Attend status hearing re mediation (.3);	0.30	\$975.00	\$292.50
10/4/2021	Brenda Horn	Draft eleventh monthly fee statement (.8); generate and edit Exhibit A to fee statement (.2); correspond with J. Bair re same (.1);	1.10	\$360.00	\$396.00
10/4/2021	Jesse Bair	Prepare for mediation status conference (.1);	0.10	\$625.00	\$62.50
10/4/2021	Brian Cawley	Participate in team meeting regarding project assignments and strategy (.2);	0.20	\$420.00	\$84.00
10/4/2021	Jesse Bair	Attend mediation status conference (.3);	0.30	\$625.00	\$187.50
10/4/2021	Brian Cawley	Attend mediation status conference (.3);	0.30	\$420.00	\$126.00
10/5/2021	Jesse Bair	Analyze New York law regarding the scope of allowable discovery in an insurance coverage action (.3);	0.30	\$625.00	\$187.50
10/5/2021	Jesse Bair	Additional research regarding the expected or intended defense under New York law (.2);	0.20	\$625.00	\$125.00
10/5/2021	Jesse Bair	Further research regarding New York law concerning the insurers' purported notice defense (.3);	0.30	\$625.00	\$187.50
10/5/2021	Jesse Bair	Edit omnibus memorandum concerning New York insurance law (.2);	0.20	\$625.00	\$125.00

10/7/2021	Jesse Bair	Review correspondence from K. Dine re upcoming Committee call (.1);	0.10	\$625.00	\$62.50
10/7/2021	Karen DempSKI	Draft pro hac vice documents for Interstate district court action for J. Bair and T. Burns (.4)	0.40	\$360.00	\$144.00
10/7/2021	Jesse Bair	Draft correspondence to PSZJ regarding omnibus New York coverage memorandum (.1);	0.10	\$625.00	\$62.50
10/7/2021	Jesse Bair	Respond to correspondence with Reed Smith re Interstate's motion to withdraw the reference (.1);	0.10	\$625.00	\$62.50
10/8/2021	Timothy Burns	Review emails from PSZJ regarding Committee and state court counsel meetings (.1);	0.10	\$975.00	\$97.50
10/8/2021	Jesse Bair	Review Diocese of Camden pre-trial scheduling order, which LMI submitted as an exhibit to the parties' joint letter to Judge Cronan (.1);	0.10	\$625.00	\$62.50
10/8/2021	Jesse Bair	Review the debtor's and LMI's joint letter to Judge Cronan re case discovery and scheduling (.2);	0.20	\$625.00	\$125.00
10/8/2021	Jesse Bair	Review LMI's letter to the Diocese regarding LMI's discovery requests (.2);	0.20	\$625.00	\$125.00
10/8/2021	Timothy Burns	Review correspondence with J. Bair and Reed Smith re Interstate's withdrawal of the reference motion (.2);	0.20	\$975.00	\$195.00
10/8/2021	Jesse Bair	Edit mediation contact sheet provided by the debtor (.1);	0.10	\$625.00	\$62.50
10/9/2021	Jesse Bair	Draft insurance status update to PSZJ re the district court insurance actions (.3);	0.30	\$625.00	\$187.50
10/10/2021	Timothy Burns	Review joint letter to Judge Cronan re pre-mediation discovery (.2);	0.20	\$975.00	\$195.00
10/11/2021	Timothy Burns	Review correspondence from J. Berringer re withdrawal of the reference proceedings (.1); related analysis regarding withdrawal of the reference issues (.1);	0.20	\$975.00	\$195.00
10/11/2021	Jesse Bair	Review correspondence from B. Michael re mediation update (.1);	0.10	\$625.00	\$62.50
10/11/2021	Jesse Bair	Review email from J. Berringer to Interstate re status of Interstate's motion to withdraw the reference (.1);	0.10	\$625.00	\$62.50
10/11/2021	Jesse Bair	Review notice of adjournment of hearing on the debtor's motion to appoint future claims representative (.1);	0.10	\$625.00	\$62.50
10/11/2021	Jesse Bair	Respond to correspondence from B. Michael re insurance question in connection with IRCP program (.1);	0.10	\$625.00	\$62.50
10/12/2021	Jesse Bair	Review draft joint letter to Judge Hellerstein requesting to hold in abeyance briefing deadlines on Interstate's motion to withdraw the reference (.1);	0.10	\$625.00	\$62.50

10/12/2021	Jesse Bair	Review draft of the proposed mediation order (.2);	0.20	\$625.00	\$125.00
10/12/2021	Timothy Burns	Review correspondence from B. Michael re mediation developments (.1);	0.10	\$975.00	\$97.50
10/12/2021	Jesse Bair	Review correspondence with Reed Smith and Interstate re potential letter to Judge Hellerstein re Interstate's motion to withdraw the reference (.1);	0.10	\$625.00	\$62.50
10/13/2021	Timothy Burns	Review LMI's reservation of rights letter (.2);	0.20	\$975.00	\$195.00
10/13/2021	Timothy Burns	Review order regarding retention of experts (.1);	0.10	\$975.00	\$97.50
10/13/2021	Timothy Burns	Review and respond to email with J. Stang about additional insureds under the Diocesan policies (.1);	0.10	\$975.00	\$97.50
10/13/2021	Timothy Burns	Review joint letter to Judge Cronan re discovery and mediation (.1);	0.10	\$975.00	\$97.50
10/13/2021	Jesse Bair	Conference with T. Burns and B. Michael re future claims rep issues (.2);	0.20	\$625.00	\$125.00
10/13/2021	Jesse Bair	Review correspondence from J. Berringer re withdrawal motion status in the Interstate district court action (.1);	0.10	\$625.00	\$62.50
10/13/2021	Timothy Burns	Review Allianz letter to Judge Hellerstein re abeyance issue (.1);	0.10	\$975.00	\$97.50
10/13/2021	Jesse Bair	Analyze exhibit to LMI's recent coverage position letter (.1);	0.10	\$625.00	\$62.50
10/13/2021	Jesse Bair	Analyze coverage position letter recently received from LMI (.2);	0.20	\$625.00	\$125.00
10/13/2021	Brian Cawley	Examine previously conducted research on DRVC historical policies (.9);	0.90	\$420.00	\$378.00
10/13/2021	Jesse Bair	Conference with T. Burns and B. Michael re insurance mediation strategy and related discovery issues (.4);	0.40	\$625.00	\$250.00
10/13/2021	Timothy Burns	Review draft proposed mediation order (.1);	0.10	\$975.00	\$97.50
10/13/2021	Timothy Burns	Conference with J. Bair and B. Michael re insurance mediation strategy and related discovery issues (.4);	0.40	\$975.00	\$390.00
10/13/2021	Jesse Bair	Preliminary analysis regarding additional insureds under the LMI and Arrowood policies (.2);	0.20	\$625.00	\$125.00
10/13/2021	Jesse Bair	Provide instructions to B. Cawley re additional analysis needed concerning additional insureds under the Diocesan policies (.1);	0.10	\$625.00	\$62.50
10/13/2021	Timothy Burns	Conference with J. Bair and B. Michael re future claims rep issues (.2);	0.20	\$975.00	\$195.00
10/14/2021	Chalisa Sims	Begin analysis regarding additional insureds under each of the Diocesan CGL policies (.6);	0.60	\$420.00	\$252.00
10/14/2021	Jesse Bair	Participate in conference with T. Burns and PSZJ re future claims rep issues (.4);	0.40	\$625.00	\$250.00

10/14/2021	Jesse Bair	Review the debtor's objection to Interstate's motion to withdraw the reference (.2);	0.20	\$625.00	\$125.00
10/14/2021	Jesse Bair	Draft status update to PSZJ regarding the Interstate district court action (.1);	0.10	\$625.00	\$62.50
10/14/2021	Jesse Bair	Participate in conference with T. Burns and PSZJ re insurance mediation strategy (.2);	0.20	\$625.00	\$125.00
10/14/2021	Timothy Burns	Conference with PSZJ and J. Bair regarding mediation strategy (.2);	0.20	\$975.00	\$195.00
10/14/2021	Brian Cawley	Examine DRVC policies regarding additional insureds information (1.2);	1.20	\$420.00	\$504.00
10/14/2021	Timothy Burns	Participate in conference with J. Bair and PSZJ re future claims rep issues (.4);	0.40	\$975.00	\$390.00
10/14/2021	Chalisa Sims	Continue analysis regarding additional insureds under each of the Diocesan CGL policies (2.0);	2.00	\$420.00	\$840.00
10/15/2021	Chalisa Sims	Further analysis regarding additional insureds under each of the Diocesan CGL policies (2.0);	2.00	\$420.00	\$840.00
10/15/2021	Leakhena Au	Assist with identifying DRVC additional insureds (.2);	0.20	\$420.00	\$84.00
10/15/2021	Brian Cawley	Continue analyzing DRVC policies in order to compile comprehensive list of additional insureds (.9);	0.90	\$420.00	\$378.00
10/15/2021	Kacy Gurewitz	Analyze additional insureds information under the Diocesan CGL policies (3.5);	3.50	\$420.00	\$1,470.00
10/15/2021	Chalisa Sims	Continue analysis regarding additional insureds under each of the Diocesan CGL policies (2.0);	2.00	\$420.00	\$840.00
10/15/2021	Brian Cawley	Continue analyzing DRVC policies in order to compile comprehensive list of additional insureds (2.0);	2.00	\$420.00	\$840.00
10/17/2021	Jesse Bair	Review Judge Cronan's order denying Evanston's withdrawal of the reference motion (.1);	0.10	\$625.00	\$62.50
10/17/2021	Jesse Bair	Review Judge Cronan's order denying Interstate's joinder motion (.1);	0.10	\$625.00	\$62.50
10/17/2021	Jesse Bair	Draft updated insurance status summary for PSZJ (.3);	0.30	\$625.00	\$187.50
10/17/2021	Jesse Bair	Review Judge Cronan's order granting Lexington's joinder motion (.1);	0.10	\$625.00	\$62.50
10/18/2021	Jesse Bair	Review correspondence from B. Michael re the debtor's future claims rep motion (.1);	0.10	\$625.00	\$62.50
10/18/2021	Jesse Bair	Review Judge Hellerstein's order withdrawing the reference as to Interstate (.1);	0.10	\$625.00	\$62.50
10/18/2021	Brian Cawley	Continue analyzing DRVC policies in order to compile comprehensive list of additional insureds (1.6);	1.60	\$420.00	\$672.00
10/18/2021	Kacy Gurewitz	Continue analyzing policy documents for additional insureds information (2.7);	2.70	\$420.00	\$1,134.00

10/18/2021	Brian Cawley	Continue analyzing DRVC policies in order to compile comprehensive list of additional insureds (2.0);	2.00	\$420.00	\$840.00
10/18/2021	Timothy Burns	Participate in part of mediation preparation call with PSZJ, BRG, and J. Bair (.4);	0.40	\$975.00	\$390.00
10/18/2021	Chalisa Sims	Continue analysis regarding additional insureds under each of the Diocesan CGL policies (2.0);	2.00	\$420.00	\$840.00
10/18/2021	Karen DempSKI	Finalize and file pro hac vice motions and accompanying materials for T. Burns and J. Bair in the Interstate district court action (.4);	0.40	\$360.00	\$144.00
10/18/2021	Chalisa Sims	Continue analysis regarding additional insureds under each of the Diocesan CGL policies (.5);	0.50	\$420.00	\$210.00
10/18/2021	Chalisa Sims	Further analysis regarding additional insureds under each of the Diocesan CGL policies (2.0);	2.00	\$420.00	\$840.00
10/18/2021	Jesse Bair	Draft correspondence to PSZJ re the Interstate district court action (.1);	0.10	\$625.00	\$62.50
10/18/2021	Jesse Bair	Participate in telephone conference with PSZJ, BRG, and T. Burns regarding mediation strategy [attended part of the call] (.3);	0.30	\$625.00	\$187.50
10/18/2021	Chalisa Sims	Continue analyzing Diocesan CGL policies to identify all additional insureds (2.0);	2.00	\$420.00	\$840.00
10/18/2021	Chalisa Sims	Continue analyzing Diocesan policy information to identify all additional insureds (2.0);	2.00	\$420.00	\$840.00
10/19/2021	Brian Cawley	Discuss additional insured research with J. Bair (.2); compile sample pages of additional insured and named insured language from policies (.5);	0.70	\$420.00	\$294.00
10/19/2021	Jesse Bair	Analyze summary of all additional insureds under the Diocesan insurance policies (.4);	0.40	\$625.00	\$250.00
10/19/2021	Jesse Bair	Draft correspondence to PSZJ re additional insureds summary under the Diocesan insurance policies (.2);	0.20	\$625.00	\$125.00
10/19/2021	Jesse Bair	Review preliminary analysis from B. Cawley re all additional insureds under the Diocesan insurance policies (.2);	0.20	\$625.00	\$125.00
10/19/2021	Jesse Bair	Participate in telephone conference with the mediator, PSZJ, and T. Burns [attended part of the call] (.8);	0.80	\$625.00	\$500.00
10/19/2021	Kacy Gurewitz	Finish reviewing policy documents to assess additional insured information (.8);	0.80	\$420.00	\$336.00
10/19/2021	Jesse Bair	Prepare for telephone conference with the mediator (.1);	0.10	\$625.00	\$62.50
10/19/2021	Timothy Burns	Prepare for telephone conference with the mediator (.6); participate in telephone conference with the mediator, PSZJ, and J. Bair (1.0);	1.60	\$975.00	\$1,560.00

10/19/2021	Brian Cawley	Participate in team meeting regarding project assignments and strategy (.2);	0.20	\$420.00	\$84.00
10/19/2021	Brian Cawley	Finalize summary of all DRVC additional insureds (1.4);	1.40	\$420.00	\$588.00
10/19/2021	Chalisa Sims	Continue analyzing Diocesan policy information to identify all additional insureds (2.0);	2.00	\$420.00	\$840.00
10/19/2021	Jesse Bair	Provide instructions to B. Cawley re follow-up analysis related to additional insured summary under the Diocesan policies (.2);	0.20	\$625.00	\$125.00
10/20/2021	Jesse Bair	Draft correspondence to PSZJ re status of the LMI district court action (.1);	0.10	\$625.00	\$62.50
10/20/2021	Jesse Bair	Review correspondence from the mediator regarding mediation procedures (.1);	0.10	\$625.00	\$62.50
10/20/2021	Jesse Bair	Review Judge Cronan's discovery order in the LMI district court action (.1);	0.10	\$625.00	\$62.50
10/20/2021	Jesse Bair	Review the order appointing the mediator (.1);	0.10	\$625.00	\$62.50
10/21/2021	Jesse Bair	Analyze PSIP information provided by the debtor (.1);	0.10	\$625.00	\$62.50
10/21/2021	Timothy Burns	Review monthly debtor PSIP claims payment data (.1);	0.10	\$975.00	\$97.50
10/21/2021	Jesse Bair	Review draft civil case management plan circulated by the Diocese in the LMI district court action (.1);	0.10	\$625.00	\$62.50
10/22/2021	Jesse Bair	Review correspondence from B. Michael re the debtor's motion for entry of an order further amending the bar date order (.1);	0.10	\$625.00	\$62.50
10/22/2021	Jesse Bair	Review the debtor's motion for entry of an order further amending the bar date order (.1);	0.10	\$625.00	\$62.50
10/24/2021	Jesse Bair	Review correspondence from B. Michael re survivor demographic information (.1);	0.10	\$625.00	\$62.50
10/25/2021	Timothy Burns	Review draft case management plan (.2);	0.20	\$975.00	\$195.00
10/25/2021	Timothy Burns	Conference with J. Bair regarding case management issues (.1);	0.10	\$975.00	\$97.50
10/25/2021	Brian Cawley	Participate in team meeting regarding project assignments and strategy (.2);	0.20	\$420.00	\$84.00
10/25/2021	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
10/25/2021	Jesse Bair	Participate in conference with T. Burns re case management issues (.1);	0.10	\$625.00	\$62.50
10/25/2021	Kacy Gurewitz	Participate in team meeting discussing outstanding issues in case (.2);	0.20	\$420.00	\$84.00
10/25/2021	Jesse Bair	Begin researching information re Arrowood's financial condition (.1);	0.10	\$625.00	\$62.50
10/25/2021	Jesse Bair	Review the debtor's proposed revisions to LMI's edits to the draft case management plan (.1);	0.10	\$625.00	\$62.50



10/25/2021	Jesse Bair	Review LMI's proposed edits to the draft case management plan in the LMI district court action (.1);	0.10	\$625.00	\$62.50
10/26/2021	Jesse Bair	Review further revised draft of the civil case management plan in the LMI district court action (.1);	0.10	\$625.00	\$62.50
10/26/2021	Timothy Burns	Participate in Committee meeting to present on insurance issues (1.2);	1.20	\$975.00	\$1,170.00
10/26/2021	Brenda Horn	Draft third interim fee application (1.2), draft declaration of T. Burns in support of same (.3); draft related Exhibits (.7); correspond with J. Bair regarding same (.1);	2.30	\$360.00	\$828.00
10/26/2021	Timothy Burns	Prepare for meeting with the Committee by analyzing Arrowood solvency issues and insurance summary (1.2);	1.20	\$975.00	\$1,170.00
10/26/2021	Jesse Bair	Continue analyzing information re Arrowood's financial condition (.7);	0.70	\$625.00	\$437.50
10/26/2021	Jesse Bair	Prepare for upcoming Committee meeting (.4);	0.40	\$625.00	\$250.00
10/26/2021	Timothy Burns	Participate in conference with J. Bair re Arrowood's financial condition issues (.2);	0.20	\$975.00	\$195.00
10/26/2021	Jesse Bair	Participate in Committee meeting to discuss insurance strategy (1.2);	1.20	\$625.00	\$750.00
10/26/2021	Jesse Bair	Participate in conference with T. Burns re Arrowood's financial condition issues (.2);	0.20	\$625.00	\$125.00
10/27/2021	Jesse Bair	Review the debtor's October 25 discovery letter to LMI (.1);	0.10	\$625.00	\$62.50
10/27/2021	Jesse Bair	Review Judge Cronan's Order regarding case discovery issues and scheduling (1);	0.10	\$625.00	\$62.50
10/27/2021	Jesse Bair	Review Evanston's renewed motion to withdraw the reference (.2);	0.20	\$625.00	\$125.00
10/27/2021	Jesse Bair	Revise and edit BBB's third interim fee application (.8);	0.80	\$625.00	\$500.00
10/27/2021	Jesse Bair	Review the parties' joint letter to Judge Cronan re case discovery issues (.1);	0.10	\$625.00	\$62.50
10/27/2021	Jesse Bair	Draft status update to PSZJ re the LMI district court action (.1);	0.10	\$625.00	\$62.50
10/28/2021	Jesse Bair	Review correspondence from B. Michael re the debtor's proposed expanded use of the proofs of claim (.1);	0.10	\$625.00	\$62.50
10/28/2021	Timothy Burns	Review emails between J. Bair and PSZJ re the LMI district court action (.2);	0.20	\$975.00	\$195.00
10/31/2021	Jesse Bair	Review additional correspondence from B. Michael re the debtor's proposed expanded use of the proofs of claim (.1);	0.10	\$625.00	\$62.50
10/31/2021	Timothy Burns	Review correspondence from PSZJ regarding expanded use of proofs of claim (.2);	0.20	\$975.00	\$195.00

**Fees Subtotal****64.30****\$34,964.00**

## Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/1/2021	Certificates of Good Standing for T. Burns and J. Bair (Wisconsin)	\$6.10
10/1/2021	Third Quarter 2021 PACER (Public Access to Court Electronic Records)	\$324.80
10/1/2021	Certificate of Good Standing for T. Burns (Illinois)	\$16.00
10/1/2021	Certificate of Good Standing for T. Burns (Missouri)	\$16.25
10/4/2021	Hearing attendance fee for T. Burns and J. Bair	\$70.00
10/18/2021	Court fee for pro hac vice motions for T. Burns and J. Bair in the Interstate district court action;	\$400.00
<b>Expenses Subtotal</b>		<b>\$833.15</b>

## Staff Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn	3.40	\$360.00	\$1,224.00
Brian Cawley	11.60	\$420.00	\$4,872.00
Chalisa Sims	17.10	\$420.00	\$7,182.00
Jesse Bair	14.60	\$625.00	\$9,125.00
Kacy Gurewitz	7.20	\$420.00	\$3,024.00
Karen Dempksi	0.80	\$360.00	\$288.00
Leakhena Au	0.20	\$420.00	\$84.00
Timothy Burns	9.40	\$975.00	\$9,165.00

**Total Due This Invoice: \$35,797.15**

Objection Deadline: January 14, 2022

BURNS BOWEN BAIR LLP

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

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Madison, WI 53703-3392

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Email: tburns@bbblawllp.com

Email: jbair@bbblawllp.com

*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:  
THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11  
Case No. 20-12345 (SCC)

**THIRTEENTH MONTHLY FEE STATEMENT OF BURNS BOWEN BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
NOVEMBER 1, 2021 THROUGH NOVEMBER 30, 2021**

Name of Applicant:	Burns Bowen Bair LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	November 1, 2021 – November 30, 2021
Amount of Compensation sought as actual, reasonable, and necessary:	\$5,678.50 80% of which is \$4,542.80
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$0
TOTAL (80% of fees and 100% of costs)	\$4,542.80

**This is the Thirteenth Monthly Fee Statement.**

### **PRELIMINARY STATEMENT**

Burns Bowen Bair LLP (“Burns Bowen Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirteenth monthly statement (the “Monthly Statement”) for the period from November 1, 2021 through November 30, 2021 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bowen Bair requests: (a) interim allowance and payment of compensation in the amount of \$4,542.80 (80% of \$5,678.50) of fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bowen Bair during the Statement Period.

### **FEEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bowen Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	1.70	\$1,657.50
Jesse Bair	Partner	2020	2013	\$625	5.80	\$3,625.00
Horn, Brenda	Paralegal	N/A	N/A	\$360	1.10	\$396.00
<b>TOTAL:</b>					<b>8.6</b>	<b>\$5,678.50</b>

2. The rates charged by Burns Bowen Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy

clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

### **NOTICE AND OBJECTION PROCEDURES**

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bowen Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bowen Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **January 14, 2022** (the “**Objection Deadline**”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bowen Bair 80% of the fees set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: December 30, 2021

BURNS BOWEN BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

**EXHIBIT A**

**EXHIBIT A****Burns Bowen Bair LLP**

10 E. Doty St., Suite 600  
 Madison, Wisconsin 53703-3392  
 608-286-2302  
 www.bbblawllp.com

**The Official Committee of Unsecured Creditors  
 of The Roman Catholic Diocese of Rockville  
 Centre**

**Issue Date :** 12/1/2021

**Bill # :** 00633

**Due Date :** Upon Receipt

**Matter:** Insurance

**Fees**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Billable Hours</u>	<u>Rate</u>	<u>Amount</u>
11/1/2021	Jesse Bair	Review correspondence from B. Michael re the debtor's amended bar date motion (.1);	0.10	\$625.00	\$62.50
11/2/2021	Jesse Bair	Review amended order establishing deadlines for filing proofs of claim (.1);	0.10	\$625.00	\$62.50
11/3/2021	Jesse Bair	Review the Committee's objection to the Debtor's bar date amendment motion (.2);	0.20	\$625.00	\$125.00
11/4/2021	Jesse Bair	Review correspondence from B, Michael re November 4 hearing outcome (.1);	0.10	\$625.00	\$62.50
11/4/2021	Jesse Bair	Analyze monthly PSIP information provided by the debtor (.1);	0.10	\$625.00	\$62.50
11/4/2021	Jesse Bair	Review draft memorandum regarding potential claims related to the seminary property (.4);	0.40	\$625.00	\$250.00
11/5/2021	Jesse Bair	Review transcript of the November 4 hearing (.2);	0.20	\$625.00	\$125.00
11/5/2021	Jesse Bair	Analysis regarding insurance question from Committee member (.1);	0.10	\$625.00	\$62.50
11/5/2021	Jesse Bair	Review proposed order confirming that the automatic stay applies to the debtor (.1);	0.10	\$625.00	\$62.50
11/5/2021	Brenda Horn	Draft BBB's twelfth monthly fee statement (.8); generate and edit exhibit A to same (.2); correspond with J. Bair re same (.1);	1.10	\$360.00	\$396.00
11/7/2021	Jesse Bair	Review correspondence from B. Michael re claims chart (.1);	0.10	\$625.00	\$62.50
11/9/2021	Jesse Bair	Review disclosure declaration from the future claims representative (.1);	0.10	\$625.00	\$62.50
11/10/2021	Jesse Bair	Review proposed protective order regarding the cemetery transaction (.1);	0.10	\$625.00	\$62.50
11/11/2021	Jesse Bair	Review the Diocese's Rule 26(a)(1) initial disclosures (.1);	0.10	\$625.00	\$62.50
11/11/2021	Jesse Bair	Review Lexington's Rule 26(a)(1) initial disclosures (.1);	0.10	\$625.00	\$62.50



11/11/2021	Jesse Bair	Review LMI's Rule 26(a)(1) initial disclosures (.1);	0.10	\$625.00	\$62.50
11/11/2021	Jesse Bair	Review the Diocese's and LMI's joint discovery letter to Judge Cronan (.1);	0.10	\$625.00	\$62.50
11/11/2021	Jesse Bair	Draft status update to PSZJ re the LMI district court action (.1);	0.10	\$625.00	\$62.50
11/12/2021	Jesse Bair	Review the Diocese's motion for an extension of time in the Evanston district court action (.1);	0.10	\$625.00	\$62.50
11/12/2021	Jesse Bair	Draft status update to PSZJ re the Evanston district court action (.1);	0.10	\$625.00	\$62.50
11/12/2021	Jesse Bair	Review Judge Cronan's order re the parties' discovery request in the LMI district court action (.1);	0.10	\$625.00	\$62.50
11/12/2021	Jesse Bair	Review correspondence from B. Michael re claims chart and upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
11/12/2021	Timothy Burns	Review email from B. Michael re upcoming Committee meeting and claims chart (.1);	0.10	\$975.00	\$97.50
11/12/2021	Timothy Burns	Review J. Bair's update email to PSZJ re status of insurance litigation (.1);	0.10	\$975.00	\$97.50
11/14/2021	Timothy Burns	Review LMI's initial disclosures (.1);	0.10	\$975.00	\$97.50
11/14/2021	Timothy Burns	Review Lexington's initial disclosures (.1);	0.10	\$975.00	\$97.50
11/14/2021	Jesse Bair	Review correspondence with T. Burns and Reed Smith re potential insurer discovery (.1);	0.10	\$625.00	\$62.50
11/14/2021	Timothy Burns	Correspondence with J. Bair re Lexington's initial disclosures (.1);	0.10	\$975.00	\$97.50
11/14/2021	Timothy Burns	Correspondence with J. Berringer re potential insurer discovery (.1);	0.10	\$975.00	\$97.50
11/14/2021	Jesse Bair	Respond to T. Burns correspondence re potential insurer discovery in connection with upcoming mediation (.1);	0.10	\$625.00	\$62.50
11/15/2021	Timothy Burns	Review email from B. Michael re committee meeting, agenda, and claims chart (.2);	0.20	\$975.00	\$195.00
11/15/2021	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
11/15/2021	Jesse Bair	Review notice of presentment of proposed order further amending the bar date order (.1);	0.10	\$625.00	\$62.50
11/16/2021	Jesse Bair	Analysis regarding Diocesan insurance information in connection with revised coverage chart (.5);	0.50	\$625.00	\$312.50
11/16/2021	Jesse Bair	Correspondence with J. Berringer re revised coverage chart (.1);	0.10	\$625.00	\$62.50
11/16/2021	Jesse Bair	Respond to correspondence with B. Michael re insurance information in connection with claims chart (.2);	0.20	\$625.00	\$125.00
11/16/2021	Jesse Bair	Review the debtor's notice of filing of the 9th amended schedule 1 to the consent order (.1);	0.10	\$625.00	\$62.50
11/17/2021	Jesse Bair	Preliminary analysis regarding initial draft of claims chart (.2);	0.20	\$625.00	\$125.00

11/17/2021	Jesse Bair	Review the debtor's letter to the mediator re forthcoming document production (.1);	0.10	\$625.00	\$62.50
11/18/2021	Jesse Bair	Review correspondence from the mediator to the parties (.1);	0.10	\$625.00	\$62.50
11/18/2021	Jesse Bair	Preliminary review of revised version of claims chart (.1);	0.10	\$625.00	\$62.50
11/18/2021	Timothy Burns	Review email with mediator re status of mediation preparations (.1);	0.10	\$975.00	\$97.50
11/18/2021	Timothy Burns	Review email from debtor counsel re mediation production (.1);	0.10	\$975.00	\$97.50
11/19/2021	Timothy Burns	Draft correspondence to J. Bair re mediation issues (.1);	0.10	\$975.00	\$97.50
11/19/2021	Jesse Bair	Review correspondence from the mediator to Committee counsel (.1);	0.10	\$625.00	\$62.50
11/19/2021	Jesse Bair	Review correspondence with PSZJ and state-court counsel re mediation issues (.1);	0.10	\$625.00	\$62.50
11/22/2021	Jesse Bair	Review correspondence from K. Dine re state court counsel meeting (.1);	0.10	\$625.00	\$62.50
11/24/2021	Jesse Bair	Review BRG's analysis regarding parish assets and Diocesan / Parish real estate assets (.3);	0.30	\$625.00	\$187.50
11/24/2021	Jesse Bair	Analysis regarding potential insurance mediation submissions (.1);	0.10	\$625.00	\$62.50
11/26/2021	Jesse Bair	Review correspondence from K. Dine re state court counsel meeting (.1);	0.10	\$625.00	\$62.50
11/27/2021	Jesse Bair	Review correspondence from I. Nasatir re recent debtor insurance activities (.1);	0.10	\$625.00	\$62.50
11/28/2021	Timothy Burns	Review and respond to I. Nasatir's email re recent debtor insurance activities (.2);	0.20	\$975.00	\$195.00
11/28/2021	Jesse Bair	Review correspondence with I. Nasatir and T. Burn re Arrowood reinsurance issues (.1);	0.10	\$625.00	\$62.50
11/28/2021	Timothy Burns	Review Parish asset analysis (.2);	0.20	\$975.00	\$195.00
11/29/2021	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
11/29/2021	Timothy Burns	Additional analysis regarding debtor mediation production issue (.1);	0.10	\$975.00	\$97.50
11/30/2021	Jesse Bair	Draft correspondence to Reed Smith re updated coverage chat (.1);	0.10	\$625.00	\$62.50
11/30/2021	Jesse Bair	Review correspondence with B. Michael and the mediator re briefing issues (.1);	0.10	\$625.00	\$62.50
11/30/2021	Jesse Bair	Participate in conference with T. Burns re case status and assignments (.1);	0.10	\$625.00	\$62.50
11/30/2021	Timothy Burns	Participate in conference with J. Bair re case status and assignments (.1);	0.10	\$975.00	\$97.50

**Fees Subtotal****8.60****\$5,678.50****Staff Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn	1.10	\$360.00	\$396.00
Jesse Bair	5.80	\$625.00	\$3,625.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Timothy Burns	1.70	\$975.00	\$1,657.50

**Total Due This Invoice: \$5,678.50**

Objection Deadline: February 12, 2022

BURNS BOWEN BAIR LLP

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

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*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11

Case No. 20-12345 (SCC)

**FOURTEENTH MONTHLY FEE STATEMENT OF BURNS BOWEN BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
DECEMBER 1, 2021 THROUGH DECEMBER 31, 2021**

Name of Applicant:	Burns Bowen Bair LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	December 1, 2021 – December 31, 2021
Amount of Compensation sought as actual, reasonable, and necessary:	\$16,037.50 80% of which is \$12,830
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$0
TOTAL (80% of fees and 100% of costs)	\$12,830

**This is the Fourteenth Monthly Fee Statement.**

## **PRELIMINARY STATEMENT**

Burns Bowen Bair LLP (“Burns Bowen Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this fourteenth monthly statement (the “Monthly Statement”) for the period from December 1, 2021 through December 31, 2021 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bowen Bair requests: (a) interim allowance and payment of compensation in the amount of \$12,830 (80% of \$16,037.50) of fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bowen Bair during the Statement Period.

### **FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bowen Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	7.70	\$7,507.50
Jesse Bair	Partner	2020	2013	\$625	11.60	\$7,250.00
Jeff Bowen	Partner	2012	2005	\$770	1.00	\$770.00
Brian Cawley	Associate	N/A	2020	\$420	.40	\$168.00
Kacy Gurewitz	Associate	N/A	2021	\$420	.30	\$126.00
Horn, Brenda	Paralegal	N/A	N/A	\$360	.60	\$216.00
<b>TOTAL:</b>					<b>21.6</b>	<b>\$16,037.50</b>

2. The rates charged by Burns Bowen Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy

clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

### **NOTICE AND OBJECTION PROCEDURES**

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bowen Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bowen Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **February 12, 2022** (the “**Objection Deadline**”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bowen Bair 80% of the fees set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: January 28, 2022

BURNS BOWEN BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

# EXHIBIT A

## Burns Bowen Bair LLP

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.bbblawllp.com

**The Official Committee of Unsecured Creditors  
of The Roman Catholic Diocese of Rockville  
Centre**

**Issue Date :** 1/5/2022

**Bill # :** 00683

**Due Date :** Upon Receipt

**Matter:** Insurance

### Fees

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Billable Hours</u>	<u>Rate</u>	<u>Amount</u>
12/1/2021	Timothy Burns	Participate in call with J. Bair, B. Cawley, and K. Gurewitz re claim matrix issues (.2);	0.20	\$975.00	\$195.00
12/1/2021	Timothy Burns	Correspondence with J. Bair re claims matrix (.1);	0.10	\$975.00	\$97.50
12/1/2021	Jesse Bair	Review correspondence from the mediator re briefing issues (.1);	0.10	\$625.00	\$62.50
12/1/2021	Jesse Bair	Participate in telephone conference with T. Burns re claims matrix (.2);	0.20	\$625.00	\$125.00
12/1/2021	Jesse Bair	Review debtor correspondence to the mediator re future claims representative participation (.1);	0.10	\$625.00	\$62.50
12/1/2021	Jesse Bair	Review the future claims representative's application for the retention of counsel and a financial advisor (.1);	0.10	\$625.00	\$62.50
12/1/2021	Jesse Bair	Review and respond to correspondence with B. Michael re claims matrix issues (.1);	0.10	\$625.00	\$62.50
12/1/2021	Jesse Bair	Review and respond to correspondence from T. Burns re claims matrix issues (.1);	0.10	\$625.00	\$62.50
12/1/2021	Brian Cawley	Discuss and strategize with T. Burns, J. Bair, and K. Gurewitz regarding potential claims matrix project (.2); review case materials in connection with same (.2);	0.40	\$420.00	\$168.00
12/1/2021	Kacy Gurewitz	Participate in meeting with J. Bair, T. Burns, and B. Cawley re potential claims matrix project (.2); review case materials in connection with same (.1);	0.30	\$420.00	\$126.00
12/1/2021	Timothy Burns	Call with J. Stang re claims matrix (.3);	0.30	\$975.00	\$292.50
12/1/2021	Timothy Burns	Review emails between PSZJ and mediator (.2);	0.20	\$975.00	\$195.00
12/2/2021	Brenda Horn	Draft thirteenth monthly fee statement (.4); generate and edit exhibit A to same (.1); correspond with J. Bair re same (.1);	0.60	\$360.00	\$216.00



12/2/2021	Jesse Bair	Preliminary analysis regarding revised debtor coverage charts (.2);	0.20	\$625.00	\$125.00
12/2/2021	Jesse Bair	Draft correspondence to PSZJ re revised debtor coverage charts (.1);	0.10	\$625.00	\$62.50
12/2/2021	Jesse Bair	Analyze LMI policies with respect to potential ambiguity in LMI policy limits (.4);	0.40	\$625.00	\$250.00
12/2/2021	Jesse Bair	Draft correspondence to T. Burns re LMI policy limit ambiguity issue (.1);	0.10	\$625.00	\$62.50
12/3/2021	Jesse Bair	Additional analysis of LMI policies with respect to LMI policy limit ambiguity issue (.3);	0.30	\$625.00	\$187.50
12/3/2021	Jesse Bair	Prepare for insurance telephone conference with T. Burns and PZSJ (.2);	0.20	\$625.00	\$125.00
12/3/2021	Jesse Bair	Participate in telephone conference with B. Michael, K. Dine, J. Stang, and T. Burns re insurance strategy in connection with upcoming mediation (.9);	0.90	\$625.00	\$562.50
12/3/2021	Jesse Bair	Review Arrowood's letter to Judge Caproni seeking to lift the stay of discovery (.2);	0.20	\$625.00	\$125.00
12/3/2021	Jesse Bair	Participate in conference with T. Burns re next-steps with respect to going-forward insurance strategy (.1);	0.10	\$625.00	\$62.50
12/3/2021	Timothy Burns	Review materials re potential LMI policy limit ambiguity (.8);	0.80	\$975.00	\$780.00
12/3/2021	Jeff Bowen	Analyze LMI policies to assess ambiguity issue (.8); conference with T. Burns re same (.2);	1.00	\$770.00	\$770.00
12/3/2021	Timothy Burns	Conference with J. Bowen re LMI policy limit ambiguity (.2);	0.20	\$975.00	\$195.00
12/3/2021	Timothy Burns	prepare for upcoming insurance call with PSZJ and J. Bair (.2);	0.20	\$975.00	\$195.00
12/3/2021	Timothy Burns	Participate in call with PSZJ and J. Bair re insurance strategy in connection with upcoming mediation (.9); ;	0.90	\$975.00	\$877.50
12/3/2021	Timothy Burns	Call with J. Berringer re LMI policy limit ambiguity issue (.2);	0.20	\$975.00	\$195.00
12/3/2021	Timothy Burns	Follow up call with J. Bair re next-steps with respect to going-forward insurance strategy (.1)	0.10	\$975.00	\$97.50
12/5/2021	Jesse Bair	Review Judge Caproni's order denying Arrowood's request to lift the discovery stay(.1);	0.10	\$625.00	\$62.50
12/5/2021	Jesse Bair	Review the debtor's objection to Evanston's motion to withdraw the reference (.1);	0.10	\$625.00	\$62.50
12/5/2021	Jesse Bair	Draft update to PSZJ re the status of the district court insurance actions (.1);	0.10	\$625.00	\$62.50
12/6/2021	Jesse Bair	Analyze the debtor's first mediation statement (1.4);	1.40	\$625.00	\$875.00
12/6/2021	Jesse Bair	Participate in call with T. Burns re mediation strategy and upcoming Committee meeting (.2);	0.20	\$625.00	\$125.00

12/6/2021	Jesse Bair	Participate in telephone conference with PSZJ and T. Burns re mediation strategy (.7);	0.70	\$625.00	\$437.50
12/6/2021	Jesse Bair	Draft correspondence to Reed Smith re mediation insurance call (.1);	0.10	\$625.00	\$62.50
12/6/2021	Jesse Bair	Review order extending expiration of the preliminary injunction staying prosecution of the CVA lawsuits (.1);	0.10	\$625.00	\$62.50
12/6/2021	Timothy Burns	Participate in call with J. Bair re mediation strategy and upcoming Committee meeting (.2);	0.20	\$975.00	\$195.00
12/6/2021	Timothy Burns	Participate in call with J. Bair and PSZJ re mediation strategy (.7);	0.70	\$975.00	\$682.50
12/7/2021	Timothy Burns	Participate in Committee meeting to discuss insurance issues (1.2);	1.20	\$975.00	\$1,170.00
12/7/2021	Timothy Burns	Review correspondence with mediator and other counsel re involvement of future claims rep in mediation (.2);	0.20	\$975.00	\$195.00
12/7/2021	Jesse Bair	Detailed analysis of Diocesan insurance policies and coverage chart in preparation for upcoming Committee meeting (1.1);	1.10	\$625.00	\$687.50
12/7/2021	Jesse Bair	Participate in Committee meeting to discuss insurance issues (1.2);	1.20	\$625.00	\$750.00
12/7/2021	Jesse Bair	Review correspondence from the mediator re the addition of the future claims rep as a mediation party (.1);	0.10	\$625.00	\$62.50
12/7/2021	Jesse Bair	Review correspondence with I. Nasatir and T. Burns re allocation issue (.1);	0.10	\$625.00	\$62.50
12/7/2021	Timothy Burns	Prepare for Committee meeting to discuss insurance issues (.8);	0.80	\$975.00	\$780.00
12/8/2021	Jesse Bair	Analyze the debtor and LMI's joint letter to Judge Cronan re the parties' discovery dispute (.1);	0.10	\$625.00	\$62.50
12/8/2021	Jesse Bair	Draft update to PSZJ re the status of the district court insurance actions (.1);	0.10	\$625.00	\$62.50
12/8/2021	Jesse Bair	Review notice of additional mediation party filed by the mediator (.1);	0.10	\$625.00	\$62.50
12/9/2021	Jesse Bair	Review Judge Cronan's order granting the parties' discovery status request (.1);	0.10	\$625.00	\$62.50
12/9/2021	Jesse Bair	Review order granting the third interim fee applications (.1);	0.10	\$625.00	\$62.50
12/10/2021	Jesse Bair	Review correspondence from B. Michael to the Committee re the debtor's first mediation submission (.1);	0.10	\$625.00	\$62.50
12/13/2021	Jesse Bair	Review BRG's analysis re Diocesan assets (.2);	0.20	\$625.00	\$125.00
12/13/2021	Jesse Bair	Analyze the mediator's first status report (.1);	0.10	\$625.00	\$62.50
12/13/2021	Jesse Bair	Respond to correspondence with Reed Smith re allocation issue (.1);	0.10	\$625.00	\$62.50

12/14/2021	Jesse Bair	Analyze recent USA Gymnastics settlement in connection with claim value and carrier payment issues (.2);	0.20	\$625.00	\$125.00
12/14/2021	Jesse Bair	Draft correspondence to T. Burns re recent USA Gymnastics sexual abuse settlement (.1);	0.10	\$625.00	\$62.50
12/14/2021	Jesse Bair	Review updated BRG analysis of Diocesan assets (.1);	0.10	\$625.00	\$62.50
12/15/2021	Jesse Bair	Review monthly PSIP information provided by the Diocese (.1);	0.10	\$625.00	\$62.50
12/16/2021	Timothy Burns	Review index to perpetrators' files (.2);	0.20	\$975.00	\$195.00
12/16/2021	Timothy Burns	Review certificate of no objection re Retention Application filed by future claims representative (.1);	0.10	\$975.00	\$97.50
12/16/2021	Timothy Burns	Review Debtor's objection to Evanston's motion to withdraw the reference (.3);	0.30	\$975.00	\$292.50
12/16/2021	Jesse Bair	Analyze information related to prior Diocesan sexual abuse settlements (.2);	0.20	\$625.00	\$125.00
12/16/2021	Jesse Bair	Respond to correspondence with B. Michael re upcoming call with the mediator (.1);	0.10	\$625.00	\$62.50
12/17/2021	Timothy Burns	Prepare for telephone conference with Reed Smith (.2)	0.20	\$975.00	\$195.00
12/17/2021	Jesse Bair	Participate in telephone conference with Reed Smith, T. Burns, and I. Nasatir re insurance issues in connection with upcoming mediation (.6);	0.60	\$625.00	\$375.00
12/17/2021	Jesse Bair	Analyze index of perpetrator files recently provided by the debtor (.1);	0.10	\$625.00	\$62.50
12/17/2021	Timothy Burns	Participate in telephone conference with Reed Smith, J. Bair, and I. Nasatir re insurance issues in connection with upcoming mediation (.6);	0.60	\$975.00	\$585.00
12/20/2021	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
12/21/2021	Jesse Bair	Analyze PSZJ's PowerPoint re mediation demand factors (.2);	0.20	\$625.00	\$125.00
12/22/2021	Jesse Bair	Review further amended list of parties authorized to view sexual abuse POCs (.1);	0.10	\$625.00	\$62.50
12/30/2021	Jesse Bair	Review correspondence from I. Nasatir re recent debtor insurance activities (.2);	0.20	\$625.00	\$125.00

<b>Fees Subtotal</b>	<b>21.60</b>	<b>\$16,037.50</b>
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### Staff Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn	0.60	\$360.00	\$216.00
Brian Cawley	0.40	\$420.00	\$168.00
Jeff Bowen	1.00	\$770.00	\$770.00
Jesse Bair	11.60	\$625.00	\$7,250.00
Kacy Gurewitz	0.30	\$420.00	\$126.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Timothy Burns	7.70	\$975.00	\$7,507.50

**Total Due This Invoice: \$16,037.50**

We appreciate your prompt payment.

**SERVICE LIST**

Debtor

Attn: Thomas Renker  
The Roman Catholic Diocese of Rockville Centre  
50 N Park Ave  
P.O. Box 9023  
Rockville Centre, NY 11571-9023

Attorneys for the Debtor

Jones Day  
Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.  
250 Vesey Street  
New York, NY 10281

The U.S. Trustee

The Office of the United States Trustee Region 2  
Attn: Greg Zipes, Esq. and Shara Cornell, Esq.  
201 Varick Street, Suite 1006  
New York, NY 10014

Objection Deadline: March 12, 2022

BURNS BOWEN BAIR LLP

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: [tburns@bbblawllp.com](mailto:tburns@bbblawllp.com)

Email: [jbair@bbblawllp.com](mailto:jbair@bbblawllp.com)

*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11

Case No. 20-12345 (SCC)

**FIFTEENTH MONTHLY FEE STATEMENT OF BURNS BOWEN BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
JANUARY 1, 2022 THROUGH JANUARY 31, 2022**

Name of Applicant:	Burns Bowen Bair LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	January 1, 2022 – January 31, 2022
Amount of Compensation sought as actual, reasonable, and necessary:	\$19,124.00 80% of which is \$15,299.20
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$245.10
TOTAL (80% of fees and 100% of costs)	\$15,544.30

**This is the Fifteenth Monthly Fee Statement.**

**PRELIMINARY STATEMENT**

Burns Bowen Bair LLP (“Burns Bowen Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this fifteenth monthly statement (the “Monthly Statement”) for the period from January 1, 2022 through January 31, 2022 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bowen Bair requests: (a) interim allowance and payment of compensation in the amount of \$15,299.20 (80% of \$19,124) of fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bowen Bair and (b) reimbursement of actual and necessary costs and expenses in the amount of \$245.10.

**FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bowen Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	9.10	\$8,872.50
Jesse Bair	Partner	2020	2013	\$625	13.10	\$8,187.50
Brian Cawley	Associate	N/A	2020	\$420	4.40	\$1,848.00
Horn, Brenda	Paralegal	N/A	N/A	\$360	.60	\$216.00
<b>TOTAL:</b>					<b>27.2</b>	<b>\$19,124.00</b>

2. The rates charged by Burns Bowen Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy

clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

### **EXPENSES INCURRED DURING THE STATEMENT PERIOD**

3. Set forth below is a categorical list of expenses incurred by Burns Bowen Bair during the Statement Period in the course of representing the Committee.

	Description	Amount
1/1/2022	Fourth Quarter 2021 PACER fees	\$245.10
	<b>TOTAL:</b>	<b>\$245.10</b>

### **NOTICE AND OBJECTION PROCEDURES**

4. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bowen Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bowen Bair submits that no other or further notice need be provided.

5. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **March 12, 2022** (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

6. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bowen Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and



promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: February 25, 2022

BURNS BOWEN BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: [tburns@bbblawllp.com](mailto:tburns@bbblawllp.com)

Email: [jbair@bbblawllp.com](mailto:jbair@bbblawllp.com)

*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

**EXHIBIT A****Burns Bowen Bair LLP**

10 E. Doty St., Suite 600  
 Madison, Wisconsin 53703-3392  
 608-286-2302  
 www.bbblawllp.com

**Issue Date :** 2/3/2022

**The Official Committee of Unsecured Creditors  
 of The Roman Catholic Diocese of Rockville  
 Centre**

**Bill # :** 00701

**Matter:** Insurance

**Fees**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Billable Hours</u>	<u>Rate</u>	<u>Amount</u>
1/3/2022	Jesse Bair	Draft correspondence to Reed Smith outlining additional insurance materials needed for production by the Diocese to the Committee (.2);	0.20	\$625.00	\$125.00
1/3/2022	Jesse Bair	Respond to correspondence from B. Michael re additional insurance materials needed for production from the Diocese (.1);	0.10	\$625.00	\$62.50
1/4/2022	Timothy Burns	Conference with J. Bair re insurance strategy and case action-items (.2);	0.20	\$975.00	\$195.00
1/4/2022	Brian Cawley	Participate in team meeting regarding project assignments and strategy (.2);	0.20	\$420.00	\$84.00
1/4/2022	Jesse Bair	Analyze additional coverage chart received from the debtor (.1);	0.10	\$625.00	\$62.50
1/4/2022	Jesse Bair	Review and respond to correspondence with Reed Smith re additional coverage correspondence needed for production to the Committee (.2);	0.20	\$625.00	\$125.00
1/4/2022	Jesse Bair	Conference with T. Burns re insurance strategy and case action-items (.2);	0.20	\$625.00	\$125.00
1/5/2022	Jesse Bair	Participate in telephone conference with PSZJ and T. Burns re insurance claims matrix (1.5);	1.50	\$625.00	\$937.50
1/5/2022	Jesse Bair	Analyze current iteration of insurance claim matrix in preparation for call with PSZJ (.6);	0.60	\$625.00	\$375.00
1/5/2022	Jesse Bair	Respond to correspondence with I. Scharf re LMI policy limits (.1);	0.10	\$625.00	\$62.50
1/5/2022	Jesse Bair	Respond to correspondence from Reed Smith re additional coverage correspondence needed for production from the Diocese (.1);	0.10	\$625.00	\$62.50
1/5/2022	Jesse Bair	Draft correspondence to I. Scharf re Ecclesia coverage (.1);	0.10	\$625.00	\$62.50
1/5/2022	Brenda Horn	Draft BBB's fourteenth monthly fee statement (.4); generate and edit Exhibit A (.1); correspond with J. Bair re same (.1)	0.60	\$360.00	\$216.00

1/5/2022	Timothy Burns	Participate in call with PSZJ and J. Bair re insurance claims matrix (1.5);	1.50	\$975.00	\$1,462.50
1/6/2022	Jesse Bair	Review correspondence with Reed Smith re recently produced debtor insurance materials (.1);	0.10	\$625.00	\$62.50
1/6/2022	Jesse Bair	Analyze further revised version of the insurance claims matrix (.2);	0.20	\$625.00	\$125.00
1/6/2022	Jesse Bair	Answer I. Nasatir questions re recent debtor insurance activities (.2);	0.20	\$625.00	\$125.00
1/6/2022	Jesse Bair	Draft correspondence to Reed Smith re additional, supplemental insurance materials needed for production from the debtor (.1);	0.10	\$625.00	\$62.50
1/7/2022	Jesse Bair	Participate in portion of telephone conference with PSZJ and state court counsel re insurance claims matrix in connection with upcoming mediation (.7);	0.70	\$625.00	\$437.50
1/7/2022	Jesse Bair	Participate in conference with T. Burns re outcome of state court counsel meeting in connection with upcoming mediation (.2);	0.20	\$625.00	\$125.00
1/7/2022	Timothy Burns	Review emails from PSZJ re projects for further case development.(.1);	0.10	\$975.00	\$97.50
1/7/2022	Timothy Burns	Participate in call with PSZJ and state court counsel re insurance claims matrix in connection with upcoming mediation (1.3); participate in post-call with J. Bair re same (.2);	1.50	\$975.00	\$1,462.50
1/8/2022	Jesse Bair	Review PSIP information recently received from the debtor (.1);	0.10	\$625.00	\$62.50
1/10/2022	Jesse Bair	Review correspondence from B. Michael re upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
1/11/2022	Jesse Bair	Respond to correspondence from B. Michael re upcoming call with the mediator (.1);	0.10	\$625.00	\$62.50
1/11/2022	Timothy Burns	Reviewed agenda and minutes in connection with upcoming Committee meeting (.2); .	0.20	\$975.00	\$195.00
1/12/2022	Timothy Burns	Reviewed and responded to emails with PSZJ re meeting with mediator (.2);	0.20	\$975.00	\$195.00
1/12/2022	Jesse Bair	Review correspondence with PSZJ re upcoming call with the mediator (.1);	0.10	\$625.00	\$62.50
1/13/2022	Jesse Bair	Review correspondence from B. Michael re preparations for upcoming call with the mediator (.1);	0.10	\$625.00	\$62.50
1/14/2022	Jesse Bair	Review correspondence from K. Dine re state court counsel meeting (.1);	0.10	\$625.00	\$62.50
1/14/2022	Jesse Bair	Review tenth amended Schedule 1 to consent order (.1);	0.10	\$625.00	\$62.50
1/14/2022	Timothy Burns	Review correspondence from K. Dine re state court counsel meeting (.1);	0.10	\$975.00	\$97.50
1/17/2022	Jesse Bair	Participate in telephone conference with PSZJ and T. Burns re mediation strategy and upcoming telephone conference with the mediator (.8);	0.80	\$625.00	\$500.00

1/17/2022	Jesse Bair	Draft correspondence to Reed Smith re status of the LMI stop-loss aggregate fund (.1);	0.10	\$625.00	\$62.50
1/17/2022	Jesse Bair	Participate in conference with T. Burns re potential strategy in connection with settlement of insurance claims (.2);	0.20	\$625.00	\$125.00
1/17/2022	Jesse Bair	Provide instructions to B. Cawley re research project in connection with potential settlement strategy (.2);	0.20	\$625.00	\$125.00
1/17/2022	Jesse Bair	Analysis regarding the scope of the sexual abuse exclusion used in the later LMI policies (.2);	0.20	\$625.00	\$125.00
1/17/2022	Jesse Bair	Participate in telephone conference with the mediator, PSZJ, and T. Burns re mediation status and next-steps (1.7);	1.70	\$625.00	\$1,062.50
1/17/2022	Timothy Burns	Analysis of case materials in preparation for call with the mediator (.3);	0.30	\$975.00	\$292.50
1/17/2022	Jesse Bair	Prepare for mediation preparation call (.3);	0.30	\$625.00	\$187.50
1/17/2022	Timothy Burns	Participate in telephone conference with PSZJ and T. Burns re mediation strategy and upcoming telephone conference with the mediator (.8);	0.80	\$975.00	\$780.00
1/17/2022	Timothy Burns	Participate in conference with J. Bair re potential strategy in connection with settlement of insurance claims (.2);	0.20	\$975.00	\$195.00
1/17/2022	Timothy Burns	Reviewed email from J. Bair to Reed Smith re LMI stop loss aggregate (.1);	0.10	\$975.00	\$97.50
1/17/2022	Brian Cawley	Discuss new research assignment with J. Bair (.2);	0.20	\$420.00	\$84.00
1/17/2022	Brian Cawley	Analyze Diocesan policy information in connection with research project from J. Bair (.3);	0.30	\$420.00	\$126.00
1/17/2022	Timothy Burns	Participate in call with mediator, PSZJ, and J. Bair re mediation (1.7);	1.70	\$975.00	\$1,657.50
1/17/2022	Timothy Burns	Drafted memorandum re outcome of call with the mediator (.4);	0.40	\$975.00	\$390.00
1/18/2022	Brian Cawley	Examine ongoing issues and projects in case (.2);	0.20	\$420.00	\$84.00
1/18/2022	Brian Cawley	Research concerning New York insurance law in connection with potential settlement strategy (2.8);	2.80	\$420.00	\$1,176.00
1/18/2022	Jesse Bair	Analyze PSZJ memorandum re fraudulent transfer claims (.2);	0.20	\$625.00	\$125.00
1/19/2022	Brian Cawley	Analyze Diocesan insurance materials regarding purported Interstate sexual abuse exclusion (.7);	0.70	\$420.00	\$294.00
1/19/2022	Jesse Bair	Continue analyzing the scope of the sexual abuse exclusions in the LMI, Interstate, and Colonial Penn policies (.5);	0.50	\$625.00	\$312.50
1/19/2022	Jesse Bair	Draft correspondence to Reed Smith re the 1985-86 Interstate policy (.1);	0.10	\$625.00	\$62.50

1/20/2022	Jesse Bair	Analyze additional information received from Reed Smith re the 1985-86 Interstate policy (.2);	0.20	\$625.00	\$125.00
1/20/2022	Jesse Bair	Respond to correspondence with Reed Smith re purported sexual abuse exclusion contained in the 1985-86 Interstate policy (.1);	0.10	\$625.00	\$62.50
1/20/2022	Jesse Bair	Draft correspondence to I. Nasatir re the scope of the sexual abuse exclusions allegedly contained in certain of the LMI, Interstate, and Colonial Penn policies (.1);	0.10	\$625.00	\$62.50
1/20/2022	Jesse Bair	Preliminary review of analysis received from the Diocese re the remaining LMI aggregate loss fund (.1);	0.10	\$625.00	\$62.50
1/20/2022	Jesse Bair	Review correspondence from I. Nasatir and I. Scharf re the LMI aggregate loss fund (.1);	0.10	\$625.00	\$62.50
1/21/2022	Jesse Bair	Additional analysis regarding remaining amount of the LMI aggregate loss fund (.1);	0.10	\$625.00	\$62.50
1/21/2022	Jesse Bair	Answer question from I. Nasatir and I. Scharf re the LMI aggregate loss fund (.1);	0.10	\$625.00	\$62.50
1/21/2022	Timothy Burns	Reviewed analysis of LMI aggregate loss fund (.2);	0.20	\$975.00	\$195.00
1/24/2022	Jesse Bair	Review correspondence from K. Dine re upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
1/26/2022	Timothy Burns	Conference with J. Bair re Arrowood letter (.1);	0.10	\$975.00	\$97.50
1/26/2022	Timothy Burns	Review letter from Arrowood to the diocese (.2);	0.20	\$975.00	\$195.00
1/26/2022	Timothy Burns	Participate in call with J. Bair and Reed Smith re Arrowood letter (.3);	0.30	\$975.00	\$292.50
1/26/2022	Jesse Bair	Participate in conference with T. Burns re recent letter received from Arrowood (.1);	0.10	\$625.00	\$62.50
1/26/2022	Jesse Bair	Participate in telephone conference with Reed Smith and T. Burns re recent Arrowood letter and the upcoming mediation (.3);	0.30	\$625.00	\$187.50
1/26/2022	Jesse Bair	Analyze recent coverage correspondence received from Arrowood (.2);	0.20	\$625.00	\$125.00
1/26/2022	Jesse Bair	Respond to correspondence with B. Michael re mediation preparations (.1);	0.10	\$625.00	\$62.50
1/26/2022	Jesse Bair	Analysis regarding potential options to move the mediation forward (.1);	0.10	\$625.00	\$62.50
1/27/2022	Jesse Bair	Review the debtor's and LMI's joint letter to Judge Cronan re the parties' ongoing discovery dispute (.1);	0.10	\$625.00	\$62.50
1/27/2022	Jesse Bair	Draft status update to PSZJ re the status of the LMI district court action (.1);	0.10	\$625.00	\$62.50
1/27/2022	Jesse Bair	Participate in telephone conference with PSZJ and T. Burns re mediation preparations, strategy, and next-steps(.6);	0.60	\$625.00	\$375.00
1/27/2022	Jesse Bair	Draft correspondence to Reed Smith re insurance claims slotting questions in connection with upcoming mediation (.2);	0.20	\$625.00	\$125.00

1/27/2022	Timothy Burns	Prepare for call with PSZJ re mediation strategy and potential discussions with Diocese (.1);	0.10	\$975.00	\$97.50
1/27/2022	Timothy Burns	Participate in call with PSZJ re mediation strategy and potential discussions with Diocese (.6);	0.60	\$975.00	\$585.00
1/28/2022	Timothy Burns	Draft correspondence to J. Bair re state court counsel call (.1);	0.10	\$975.00	\$97.50
1/28/2022	Timothy Burns	Correspondence with Reed Smith re DRVC slotting chart (.1); participate in call with J. Bair re same (.1);	0.20	\$975.00	\$195.00
1/28/2022	Jesse Bair	Preliminary review re debtor claims-slotting chart in connection with upcoming mediation (.1);	0.10	\$625.00	\$62.50
1/28/2022	Jesse Bair	Draft correspondence to PSZJ re debtor claims-slotting chart (.1);	0.10	\$625.00	\$62.50
1/28/2022	Jesse Bair	Review proposed correspondence from B. Michael to the mediator (.1);	0.10	\$625.00	\$62.50
1/28/2022	Jesse Bair	Conference with T. Burns re the debtor's claims-slotting chart (.1);	0.10	\$625.00	\$62.50
1/31/2022	Jesse Bair	Review correspondence from B. Michael to the mediator (.1);	0.10	\$625.00	\$62.50
1/31/2022	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
1/31/2022	Jesse Bair	Review correspondence from B. Michael re reconciling the debtor's claim slotting chart (.1);	0.10	\$625.00	\$62.50
<b>Fees Subtotal</b>			<b>27.20</b>		<b>\$19,124.00</b>

**Expenses**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
1/1/2022	Fourth Quarter 2021 PACER charges	\$245.10
<b>Expenses Subtotal</b>		<b>\$245.10</b>

**Staff Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn	0.60	\$360.00	\$216.00
Brian Cawley	4.40	\$420.00	\$1,848.00
Jesse Bair	13.10	\$625.00	\$8,187.50
Timothy Burns	9.10	\$975.00	\$8,872.50

**Total Due This Invoice: \$19,369.10**

**EXHIBIT F**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 20-12345 (SCC)
	)	
THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
	)	
Debtor. <sup>1</sup>	)	

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**ORDER GRANTING  
FOURTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BOWEN BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM OCTOBER 1, 2021 THROUGH JANUARY 31, 2022**

Burns Bowen Bair LLP (“BBB”) as Special Insurance Counsel to the Official Committee of Unsecured Creditors in the above-captioned case, filed its Fourth Interim Application for Compensation for the Period from October 1, 2021 through January 31, 2022 (the “Fee Application”). The Court has reviewed the Fee Application and finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Fee Application, and any hearing on the Fee Application, was adequate under the circumstances; and (c) all persons with standing have been afforded the opportunity to be heard on the Fee Application. Accordingly, it is hereby

**ORDERED** that the fourth Fee Application is GRANTED. The Debtor in the above case shall pay to BBB interim fees in the total amount of \$76,882.25 for services rendered and actual and necessary expenses in the Chapter 11 case during the Interim Compensation Period, after deducting interim payments already received by BBB pursuant to the Interim

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<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.



Compensation Orders for necessary professional services rendered by BBB, for the period  
October 1, 2021 through January 31, 2022.

**ORDERED** that this Court retains jurisdiction with respect to all matters arising  
from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2022.  
New York, New York

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THE HONORABLE SHELLEY C. CHAPMAN  
U.S. BANKRUPTCY JUDGE